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**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC  
COMPANY,

Debtors.

- ☒ Affects Both Debtors  
☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company

Case No. 19-30088 (DM) (Lead Case)  
Chapter 11  
(Jointly Administered)

**SECURITIES LEAD PLAINTIFF'S  
PROPOSED EDITS TO THE SECURITIES  
CLAIM BAR DATE NOTICE, SECURITIES  
CLAIM PROOF OF CLAIM, AND PROPOSED  
ORDER**

Lead Plaintiff,<sup>1</sup> on behalf of itself and the Class, together with the Securities Act  
Plaintiffs (collectively, the "Securities Plaintiffs"), pursuant to the Court's Intentions Re

<sup>1</sup> Capitalized terms used but not defined herein have the meanings given in *Securities Lead Plaintiff's Motion to Apply Bankruptcy Rule 7023 to Class Proof of Claim* (the "**Motion**") [ECF No. 5042] or *Securities Lead Plaintiff's Reply in Further Support of Motion to Apply Bankruptcy Rule 7023 to Class Proof of Claim* (the "**Reply**") [ECF No. 5452]. The reservation of rights annexed to the Motion as **Exhibit B** is incorporated herein by reference.

1 Proposed Order with respect to the Motion (the “Court’s Intentions”) [ECF No. 5888] entered on  
2 February 24, 2020, hereby submits (i) the attached clean and redline revision of the proposed  
3 Securities Claim Bar Date Notice (the “Notice”), as Exhibit A, (ii) the attached clean and redline  
4 revision of the proposed Securities Claim Proof of Claim Form (the “POC”), as Exhibit B, and  
5 (iii) the attached clean and redline revision of the proposed order submitted by the Debtors, as  
6 Exhibit C. The attached reflect revisions that the Securities Plaintiffs believe are necessary  
7 assuming the Court extends the bar date, as opposed to granting the Motion, as envisioned by the  
8 Court’s Memorandum Decision Regarding Motion to Apply Rule 7023 (ECF No. 5887)].<sup>2</sup>  
9 While the Securities Plaintiffs remain steadfast in their position that the application of Rule 7023  
10 to the timely filed class proofs of claim in these Chapter 11 Cases is the only reasonable  
11 alternative to insure that the rights of class members, including their due process rights, are  
12 protected, the revisions set forth in the attached Notice, POC, and proposed order are necessary  
13 and provided pursuant to the Court’s invitation in the Court’s Intentions. Lead Plaintiff’s  
14 counsel will be available at the hearing on February 26, 2020 to respond to any questions from  
15 the Court with respect to these edits and comments, which are intended to supplement those  
16 already provided by the Court.

17 Dated: February 26, 2020

Respectfully submitted,

18 **LOWENSTEIN SANDLER LLP**  
19 **MICHELSON LAW GROUP**

20 By: /s/ Randy Michelson  
Randy Michelson (SBN 114095)

21 *Bankruptcy Counsel to Lead Plaintiff and the Class*

22 - and -

23 **LABATON SUCHAROW LLP**

24 *Lead Counsel to Lead Plaintiff and the Class*

25 - and -  
26

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27 <sup>2</sup> Securities Plaintiffs reserve all rights with respect to any order entered by the Court with  
28 respect to the Motion, including but not limited to, all appellate rights as to any issue in  
connection with the Motion, the right to seek reconsideration and/or rights under the Federal  
Rules of Civil Procedure made applicable by the Federal Rules of Bankruptcy Procedure.

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**WAGSTAFFE, VON LOEWENFELDT, BUSCH  
& RADWICK, LLP**

*Liaison Counsel for the Class*

- and -

**ROBBINS GELLER RUDMAN & DOWD LLP**

*Counsel for the Securities Act Plaintiffs*

- and -

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